

ROBERT M. DRASKOVICH, ESQ.  
Nevada Bar No. 6275  
TURCO & DRASKOVICH, LLP.  
815 South Casino Center Blvd.  
Las Vegas, Nevada 89101-6718  
702.474.4222  
Attorney for Defendant Romero-Sanchez

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,	)	CASE NO: 2:14-MJ-00719-VCF
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	<b>STIPULATION TO CONTINUE</b>
	)	<b>PRELIMINARY HEARING</b>
	)	
MARCO MAGANA, et al.,	)	
	)	
Defendants.	)	
_____	)	

IT IS HEREBY STIPULATED AND AGREED by and between DANIEL G. BOGDEN, United States Attorney, and AMBER M. CRAIG, counsel for the United States of America; ROBERT M. DRASKOVICH, counsel for Defendant, FIDEL ROMERO-SANCHEZ; JOHN MILLION TURCO, counsel for Defendant, MARCO MAGANA; MICHAEL I. GOWDEY, counsel for Defendant, ERNESTO SORIA-SARABIA; JOSHUA L. TOMSHECK, counsel for Defendant JAVIER LOERA-JUAREGUI; DONALD J. GREEN, counsel for Defendant, FRANCISCO DIAZ; and KAREN WINCKLER, counsel for Defendant GRISELDA PEREZ, that the preliminary hearing currently scheduled for April 24, 2015 at the hour of 4:00 p.m., be vacated for thirty (30) days, or to a date and time to be set by this Honorable Court.

This Stipulation is entered into for the following reasons:

1. Attorney Donald Green recently substituted in for Defendant Francisco Diaz.

2. The parties are attempting to resolve the case with a pre-indictment plea and require additional time to discuss the terms of the plea with the defendants.

3. Denial of this request for continuance of the preliminary hearing would prejudice both the defendants and the Government and unnecessarily consume this Court's valuable resources, taking into account the exercise of due diligence.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code §§ 3161(b) and 3161(h)(8)(A), considering the factors under Title 18, United States Code § 3161(h)(8)(B)(I) and (iv).

This is the sixth request to continue the preliminary hearing date filed herein.

DATED this 23<sup>rd</sup> day of April, 2015.

DANIEL G. BOGDEN  
UNITED STATES ATTORNEY

Robert M. Draskovich  
/s/\_\_\_\_\_  
ROBERT M. DRASKOVICH, ESQ.  
Nevada Bar No. 6275  
Attorney for Defendant Romero-Sanchez

Amber M. Craig  
/s/\_\_\_\_\_  
AMBER M. CRAIG  
Assistant United States Attorney

John Million Turco  
/s/\_\_\_\_\_  
JOHN MILLION TURCO, ESQ.  
Nevada Bar No. 6152  
Attorney for Defendant Magana

Michael I. Gowdey  
/s/\_\_\_\_\_  
MICHAEL I. GOWDEY, ESQ.  
Nevada Bar No. 6994  
Attorney for Defendant Soria-Sarabia

///

///

///

Joshua L. Tomsheck

Donald J. Green

/s/

/s/

JOSHUA L. TOMSHECK, ESQ.

DONALD J. GREEN, ESQ.

Nevada Bar No. 9210

Nevada Bar No. 3989

Attorney for Defendant Loera-Juaregui

Attorney for Defendant Diaz

Karen Winckler

/s/

KAREN WINCKLER, ESQ.

Nevada Bar No. 2809

Attorney for Defendant Perez

///

///

///

///

1 ROBERT M. DRASKOVICH, ESQ.  
2 Nevada Bar No. 6275  
3 TURCO & DRASKOVICH, LLP.  
4 815 South Casino Center Blvd.  
5 Las Vegas, Nevada 89101-6718  
6 702.474.4222  
7 Attorney for Defendant Romero-Sanchez

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA, ) CASE NO: 2:14-MJ-00719-VCF  
11 Plaintiff, )  
12 vs. )  
13 ) **ORDER CONTINUING**  
14 ) **PRELIMINARY HEARING**  
15 MARCO MAGANA, et al., )  
16 Defendants. )  
17 )

18 Based upon the pending Stipulation of counsel, and good cause appearing therefor, the  
19 Court hereby finds that:

20 IT IS HEREBY ORDERED that the preliminary hearing in the above-captioned matter  
21 currently scheduled for April 24, 2015 at 4:00 p.m., be vacated and continued to  
22 May 27, 2015 at the hour of 4:00 p.m.

23 DATED AND DONE this 23rd day of April, 2015.

24   
UNITED STATES MAGISTRATE JUDGE

25 Respectfully Submitted By:

26 /s/ Robert M. Draskovich

27 Robert M. Draskovich, Esq.  
28 Nevada Bar No. 6275  
Attorney for Defendant Romero-Sanchez